

U S WEST, Inc.
Suite 700
1020 Nineteenth Street, NW
Washington, DC 20036
202 429-3106
FAX 202 296-5157

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USWEST

Cyndie Eby
Executive Director-
Federal Regulatory

EX PARTE

July 9, 1996

RECEIVED

JUL - 9 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Stop Code 1170
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

RE: CC Docket No. 96-98 Implementation of the Local Competition
Provisions in the Telecommunications Act of 1996

Dear Mr. Caton:

Attached hereto are two copies of a letter that was sent to Mr. Robert Tanner of the Policy and Program Planning Division. This submission was made at the request of Mr. Tanner and therefore, pursuant to paragraph 291 of the NPRM released in the above-referenced proceeding on April 19, 1996, the submission does not count against U S WEST's page limit for ex parte filings made in this proceeding.

In accordance with Commission Rule 1.1206(a)(1), two copies of the letter are being filed with you for inclusion in the public record. Acknowledgement and date of receipt of this submission are requested. A copy of this transmittal letter is provided for this purpose. Please contact me if you have any questions.

Sincerely,

Cyndie Eby

Attachments

cc: Mr. Robert Tanner

OH

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Cyndie Eby
Executive Director-
Federal Regulatory

July 9, 1996,

Mr. Robert Tanner
Attorney Advisor
Policy and Program Planning Division
Federal Communications Commission
1919 M Street, NW, Room 544
Washington, DC 20554

RE: CC Docket No. 96-98 Implementation of the Local Competition
Provisions in the Telecommunications Act of 1996

Dear Mr. Tanner:

Per your request, the following information provides detail regarding the recent discussion U S WEST had with the Common Carrier Bureau regarding interconnection/competitive local exchange carrier (CLEC) access to operational support systems (OSS). U S WEST provided the Commission with an update on its plan for meeting CLEC OSS needs. As a starting point, USW indicated that it was in the process of developing OSSs to meet the billing, ordering, provisioning, and maintenance and repair needs of interexchange carriers (IXCs) and expected to use these systems as platforms with which to build similar OSSs for CLEC. We noted that the best measure of the time and expense required to develop CLEC OSSs would be industry experience in developing similar systems for interexchange carriers. As an example of what would be involved, we reviewed our experience in developing and implementing an electronic trouble reporting system for interexchange carriers. We noted that more than two years was spent by joint industry groups (i.e. fora) defining systems requirements, standardizing interfaces and structure necessary for information exchange, and designing detailed implementation methods and procedures. At a minimum, these industry-wide functions would take at least 12 months if the existing IXC trouble administration system were modified to support CLECs. Even then, additional time would be

Mr. Robert Tanner
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required to select and install vendor software or internally develop systems. Furthermore, systems work in tandem and changes/upgrades to one OSS require changes to interconnection systems. All in all we estimated that even the simplest OSS would not be available for use until 24 months after the decision was made to proceed with development. One of the most time consuming aspects in systems development is the task of defining exactly what needs to be done - this is not a solitary task, but a joint industry effort that requires the cooperation of all parties.

The following additional points were made during the discussion:

- Mediation is necessary if system and network integrity is to be protected.

- Systems development will become much more complex and many times more expensive if sub-loop unbundling is mandated. Similarly, new database would have to be created and populated.

- Systems development is a "two-way street."
Interconnectors/CLECs must develop compatible systems if they are to take advantage of LEC electronic interfaces. No systems are commercially available from vendors today.

- LECs development costs are significant and LECs should be allowed to recover those costs.

- LECs cannot develop individualized systems for each CLEC/interconnector; some level of system uniformity is required.

- If the Commission does adopt electronic interface requirements, it should provide broad guidelines and avoid detailed requirements.

This submission is at your request and therefore, pursuant to paragraph 291 of the NPRM released in the above-referenced proceeding on April 19, 1996, the submission does not count against U S WEST's page limit for ex parte filings made in this proceeding. If you have additional questions please give me a call.

Sincerely,

Cyndie Eley